

1 ALLISON M. BROWN (Admitted *Pro Hac Vice*)
2 alli.brown@kirkland.com
3 JESSICA DAVIDSON (Admitted *Pro Hac Vice*)
4 jessica.davidson@kirkland.com
5 CHRISTOPHER D. COX (Admitted *Pro Hac Vice*)
6 christopher.cox@kirkland.com
7 **KIRKLAND & ELLIS LLP**
8 601 Lexington Avenue
9 New York, NY 10022
10 Telephone: (212) 446-4800

11 MICHAEL B. SHORTNACY (SBN: 277035)
12 mshortnacy@shb.com
13 **SHOOK, HARDY & BACON L.L.P.**
14 2121 Avenue of the Stars, Suite 1400
15 Los Angeles, CA 90067
16 Telephone: (424) 285-8330

17 PATRICK L. OOT (Admitted *Pro Hac Vice*)
18 oot@shb.com
19 **SHOOK, HARDY & BACON L.L.P.**
20 1800 K St. NW Ste. 1000
21 Washington, DC 20006
22 Telephone: (202) 783-8400

23 *Attorneys for Defendants*
24 UBER TECHNOLOGIES, INC.;
25 RASIER, LLC; and RASIER-CA, LLC

18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA
20 SAN FRANCISCO DIVISION

21 IN RE: UBER TECHNOLOGIES, INC.,
22 PASSENGER SEXUAL ASSAULT
23 LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF MICHAEL B.
SHORTNACY IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS
CASES FOR FAILURE TO COMPLY WITH
PTO 5**

24 This Document Relates to:

Date: February 13, 2026
Time: 10:00 a.m.
Courtroom: 6 – 17th Floor

25 *Jane Doe NLG 2 (S.G.) v. Uber*
26 *Technologies, Inc., et al.*, No. 3:25-cv-
27 08707-CRB
28

1 *Jane Doe NLG 3 (B.G.) v. Uber*
2 *Technologies, Inc., et al.*, No. 3:25-cv-
08732-CRB

3 *Jane Doe NLG 2 (J.H.) v. Uber*
4 *Technologies, Inc., et al.*, No. 3:25-cv-
08736-CRB

5 *Jane Doe NLG (V.S.) v. Uber*
6 *Technologies, Inc., et al.*, No. 3:25-cv-
08757-CRB

7 *Jane Doe NLG 3 (P.L.) v. Uber*
8 *Technologies, Inc., et al.*, No. 3:25-cv-
08865-CRB

9 *Jane Doe NLG (M.S.) v. Uber*
10 *Technologies, Inc., et al.*, No. 3:25-cv-
09006-CRB

11 *Jane Doe NLG (A.B.) v. Uber*
12 *Technologies, Inc., et al.*, No. 3:25-cv-
09180-CRB

13 *Jane Doe NLG (M.O.) v. Uber*
14 *Technologies, Inc., et al.*, No. 3:25-cv-
09181-CRB

15 *Jane Doe NLG (R.R.) v. Uber*
16 *Technologies, Inc., et al.*, No. 3:25-cv-
09182-CRB

17 *Jane Doe NLG (K.G.) v. Uber*
18 *Technologies, Inc., et al.*, No. 3:25-cv-
09184

19 *Jane Doe NLG (J.R.) v. Uber*
20 *Technologies, Inc., et al.*, No. 3:25-cv-
09186-CRB

21 *Jane Doe NLG (T.J.) v. Uber*
22 *Technologies, Inc., et al.*, No. 3:25-cv-
09193-CRB

23 *Jane Doe NLG (C.P.) v. Uber*
24 *Technologies, Inc., et al.*, No. 3:25-cv-
09194-CRB

25 *Jane Doe NLG (R.M.) v. Uber*
26 *Technologies, Inc., et al.*, No. 3:25-cv-
09197-CRB

1 *Jane Doe NLG (A.G.) v. Uber*
2 *Technologies, Inc., et al.*, No. 3:25-cv-
09205-CRB

3 *Jane Doe NLG (C.B.) v. Uber*
4 *Technologies, Inc., et al.*, No. 3:25-cv-
09213-CRB

5 *Jane Doe NLG (G.Z.) v. Uber*
6 *Technologies, Inc., et al.*, No. 3:25-cv-
09315-CRB

7 *Jane Roe CL 223 v. Uber Technologies,*
8 *Inc., et al.*, No. 3:25-cv-09393-CRB

DECLARATION OF MICHAEL B. SHORTNACY

I, Michael B. Shortnacy, declare pursuant to 28 U.S.C. § 1746:

1. I am over the age of 18 and am a resident of Los Angeles, California. I respectfully submit this declaration in support of Defendants Uber Technologies, Inc.’s, Rasier, LLC’s, and Rasier-CA, LLC’s (collectively, “Uber’s”) Motion to Dismiss Cases for Failure to Comply with PTO 5.

2. I am a partner at the law firm of Shook, Hardy & Bacon L.L.P., representing Uber in this MDL as well as in Judicial Council Coordination Proceeding No. 5188, *In Re: Uber Rideshare Cases*, Case No. CJC-21-005188 (the “JCCP”). I am a member in good standing of the Bar of the State of California, the Bar of the State of New York, and the Bar of the District of Columbia. I make this declaration based upon matters within my own personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.

3. On December 28, 2023, this Court entered Pretrial Order No. 5 (“PTO 5”) in this matter, requiring each Plaintiff to “produce to Defendants a bona fide ride receipt from an Uber trip connected to the alleged incident.” ECF No. 175 at 2. PTO 5 required each Plaintiff whose case was a part of the MDL by February 1, 2024, to produce the receipt (or, if a receipt was not readily available, certain ride information) within 14 days of that date—i.e., by February 15, 2024. *Id.* Each Plaintiff who joined the MDL after February 1, 2024 had to produce the ride receipt or ride information within 14 days of joining. *Id.* at 3.

4. Attached to this declaration as Exhibit A is a table identifying eighteen Plaintiffs who, as of December 31, 2025, have failed to produce a ride receipt or ride information as required by PTO 5. Each of these Plaintiffs was sent a written Notice of Delinquency, warning Plaintiffs of their failure to timely produce ride receipts or information and giving them thirty days to respond, on the date specified in Exhibit A. The Plaintiffs’ deadlines to comply with PTO 5 are identified in the table at Exhibit A.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 31, 2025 in Los Angeles, California.

SHOOK, HARDY & BACON L.L.P.

/s/ Michael B. Shortnacy

MICHAEL B. SHORTNACY (SBN: 277035)
mshortnacy@shb.com

SHOOK, HARDY & BACON L.L.P.

2121 Avenue of the Stars, Suite 1400

Los Angeles, CA 90067

Telephone: (424) 285-8330

Facsimile: (424) 204-9093

Attorney for Defendants

UBER TECHNOLOGIES, INC., RASIER,
LLC, and RASIER-CA, LLC